

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SOFTWARE FREEDOM
CONSERVANCY, INC. and ERIK
ANDERSEN,

Plaintiffs,

v.

BEST BUY CO., INC.; SAMSUNG
ELECTRONICS AMERICA, INC.;
WESTINGHOUSE DIGITAL
ELECTRONICS, LLC; JVC AMERICAS
CORPORATION; WESTERN DIGITAL
TECHNOLOGIES, INC.; ROBERT
BOSCH LLC; PHOEBE MICRO, INC.;
HUMAX USA INC.; COMTREND
CORPORATION; DOBBS-STANDFORD
CORPORATION; VERSA
TECHNOLOGY INC.; and GCI
TECHNOLOGIES CORPORATION,

Defendants.

Civil Action No: 09-cv-10155 (SAS)
Judge Scheindlin

DECLARATION OF ARTHUR MOORE
IN SUPPORT OF RESPONDENT
WESTINGHOUSE DIGITAL, LLC'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR JOINDER [ECF 133]
UNDER FED. R. CIV. P. 25(C)

I, Arthur Moore, declare as follows:

1. I am currently Senior Counsel for Westinghouse Digital, LLC ("WD").

Prior to April 2, 2010, I was in-house counsel for Westinghouse Digital Electronics, LLC, now known as Mora Electronics, LLC ("Mora").

2. Attached to RESPONDENT WESTINGHOUSE DIGITAL, LLC'S
OPPOSITION TO PLAINTIFFS' MOTION FOR JOINDER [ECF 133] UNDER FED.
R. CIV. P. 25(C) as Exhibit B is a true and correct copy of a complaint filed by WD on
August 2, 2010 captioned *Westinghouse Digital, LLC v. Samsung Electronics Co., Ltd.,
LG Electronics, inc., Trustees of the Columbia University in the City of New York*,

Software Freedom Conservancy, Inc., Erik Andersen, Darwin Chang, Credit Managers Association of California d/b/a Credit Management Association, and All Persons Unknown Claiming an Interest in the Property, Superior Court of California, Orange County, Case No. 30-2010-00395529-CU-MC-CXC.

3. Attached to RESPONDENT WESTINGHOUSE DIGITAL, LLC'S OPPOSITION TO PLAINTIFFS' MOTION FOR JOINDER [ECF 133] UNDER FED. R. CIV. P. 25(C) as Exhibit C is a true and correct copy of pertinent portions of a confidential Asset Purchase Agreement between Golden Star Electronics, LLC and Credit Managers Association of California ("CMA").

4. Attached to RESPONDENT WESTINGHOUSE DIGITAL, LLC'S OPPOSITION TO PLAINTIFFS' MOTION FOR JOINDER [ECF 133] UNDER FED. R. CIV. P. 25(C) as Exhibit D is a true and correct copy of a Press Release obtained from plaintiff Software Freedom Conservancy's website on September 15, 2010.

5. Attached to RESPONDENT WESTINGHOUSE DIGITAL, LLC'S OPPOSITION TO PLAINTIFFS' MOTION FOR JOINDER [ECF 133] UNDER FED. R. CIV. P. 25(C) as Exhibit E is a true and correct copy of the California Secretary of State online record for Mora Electronics, LLC downloaded on September 16, 2010.

6. Attached to RESPONDENT WESTINGHOUSE DIGITAL, LLC'S OPPOSITION TO PLAINTIFFS' MOTION FOR JOINDER [ECF 133] UNDER FED. R. CIV. P. 25(C) as Exhibit F is a true and correct copy of Bulletin No. 1, 34323 Proof of Claim Enclosed distributed by CMA.

7. Westinghouse Digital Electronics, LLC (n/k/a Mora) was wholly-owned and was managed before April 2, 2010 by Nexis, Inc., a California corporation, which in

turn was wholly-owned by Nexis Holdings, LLC, a Delaware limited liability company. I have reviewed a federal bankruptcy filing by Nexis, Inc. in which Nexis states that it owned 100% of Mora Electronics, LLC, and a bankruptcy filing of Richard Houg in which Mr. Houg states that he owned 49% of Nexis Holdings, LLC. Richard Houg's filing also confirms that Nexis Holdings owned 100% of Nexis, Inc.

8. WD at all times has been wholly owned by Northwood Partners Limited, a private investment entity registered under the laws of the Hong Kong Special Administrative Region. Neither Nexis, Inc. nor Richard Houg reported any ownership interest in Northwood Partners (or, of course, in WD) in their respective federal bankruptcy filings.

9. WD is managed by WD Manager, LLC, a Delaware limited liability company, who in turn is managed by Mr. Eric Chen and is wholly owned by Northwood Partners Limited. Mr. Chen had no involvement in Mora or Nexis.

10. WD is and was on April 2, 2010 a Delaware limited liability corporation headquartered in Orange, California.

11. I declare under penalty of perjury that the foregoing is true and correct

Executed on September 20, 2010 in Orange, California.

/s/ Arthur Y. Mune